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ORIGINAL

May 1, 2006

RECEIVED

MAY - 1 2006

Federal Communications Commission
Office of Secretary

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket 94-102
E911 Handset Penetration Quarterly Report
Cellular Network Partnership, A Limited Partnership d/b/a Pioneer Cellular

Dear Ms. Dortch:

On behalf of Cellular Network Partnership, A Limited Partnership d/b/a Pioneer Cellular, there is submitted herewith a report of the status of the carrier's progress in achieving 95% systemwide handset of location-capable handsets.

Pioneer Cellular is a Tier III digital wireless carrier operating cellular radiotelephone and personal communications services in portions of Oklahoma and Kansas. This report is submitted in compliance with the terms of the *Order*, CC Docket No. 94-102, FCC 06-9, released February 10, 2006, conditionally granting Pioneer Cellular an extension through December 31, 2006, of the deadline for compliance with Section 20.18(g)(1)(v) of FCC rules, 47 C.F.R. § 20.18(g)(1)(v).

Pursuant to Sections 0.457(d) and 0.459 of FCC Rules, it is hereby requested that the information reported herein, in the narrative report and attached spreadsheet, be treated by the Commission as confidential, and be withheld from public inspection. The information, which would not customarily be released to the public, is confidential commercial information, and should be protected in accordance with Sections 0.457(d) and 0.459 of FCC Rules.

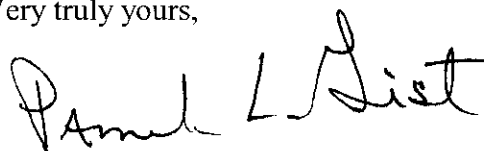
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May 1, 2006
Federal Communications Commission
Page two

Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,

A handwritten signature in black ink, reading "Pamela L. Gist". The signature is written in a cursive style, with the first name "Pamela" and the last name "Gist" being more prominent than the middle initial "L".

Pamela L. Gist

**CELLULAR NETWORK PARTNERSHIP, A LIMITED PARTNERSHIP
D/B/A PIONEER CELLULAR**

E911 REPORT

MAY 1, 2006

The following information is submitted in accordance with FCC directive:

1. The number and status of Phase II requests from Public Safety Answering Points

Within the wireless service area of Pioneer Cellular, there are a total of seventy-seven PSAPs. Of those, ten have requested Phase II services. To the best of Pioneer Cellular's knowledge, all ten have become or will become capable of receiving and utilizing Phase II data. Pioneer Cellular is delivering Phase II data, and the data is being processed by two of those PSAPs. It is Pioneer Cellular's understanding that the other sixty-seventy PSAPs are exploring means for funding E911 before requesting the service from carriers.

2. The dates on which Phase II service has been implemented or will be available to PSAPs served by Pioneer Cellular's wireless network

Pioneer Cellular began providing Phase II services to the two capable PSAPs in Grady and McClain Counties in December 2005. Phase II data will be delivered to the additional requesting PSAPs when those PSAPs become capable, and within six months of their requests. Pioneer Cellular anticipates deployment of Phase II services for one requesting PSAP, in Montgomery County, in May 2006, and deployment in eight more counties in or before September 2006. Those are

Custer, Beckham, Roger Mills, Harmon, Kiowa, Montgomery, Sumner and Sedgwick Counties.

All functions and processes will be tested with the PSAPs by Pioneer Cellular's E911 provider, Intrado. Intrado will install and test the equipment necessary to transmit E911 data to each requesting PSAP. Intrado will operate the location database and will optimize E911 performance on Pioneer Cellular's CDMA network system. Pioneer Cellular stands ready to honor requests for Phase II services in a timely manner, as it receives requests and as the PSAPs become able to receive and process Phase II data.

3. The status of coordination efforts with PSAPs for alternative 95% handset penetration dates

Pioneer Cellular is actively working with the PSAPs to keep them informed of the carrier's progress in achieving higher location-capable handset penetration rates. Robert Cannon of Intrado contacts each PSAP on a regular basis to report the penetration figure. The response of each PSAP has been positive. No PSAP has expressed objection to the projected schedule.

4. Efforts to encourage customers to upgrade to location-capable handsets

By means of billing inserts, direct mail, TV, radio and print advertising, customers are being informed that by upgrading their handsets they will have increased coverage and enhanced ability to stay in touch with family at competitive rates. The campaigns advertise the features of CDMA phones and

emphasize as a feature of the new phones their location assistance capabilities in the event of emergency. The ads target TDMA and analog customers with special offers for location capable handsets. Promotional offerings include a free phone, free activation and free first month of service. Pioneer Cellular has initiated a "Safe and Secure" marketing plan created specifically for non-E911 location capable customers. Since the roll out of the plan, eighty-nine customers have made the switch to location-capable handsets. Of those, fifty-nine were recruited just since the April mailer for the targeted program.

Promotions for phones with cameras, ringtones, color screens and other features also encourage customers to upgrade their handsets. Gift certificates to L.L.Bean are awarded as an incentive to upgrade. Free phone offers directed to TDMA and analog customers have been accompanied by free minutes, free text messaging, and free data/MMS plans. Customers can purchase new accessories for their new handsets and some promotions are added for up to 25% off retail pricing. All handsets do require a service commitment. Generic promotions are conducted with the intent to entice existing customers into visiting one of Pioneer Cellular's retail stores where only location-capable phones are sold, and where TDMA and analog customers can be educated about the benefits of CDMA and E911 location capabilities. Pioneer Cellular's promotional campaigns are being conducted in print ads, by direct mail, by billing inserts and on the radio. Special offers are also posted on the carrier's web site and by signage on premises.

5. The percentage of customers with location-capable phones

At present approximately 91.5% of Pioneer Cellular's subscribers are using Phase II location-capable handsets.

6. Status in achieving compliance and whether Pioneer Cellular is on schedule to meet its revised 12/31/06 deadline

Pioneer Cellular maintains its policy of selling and activating only location-capable digital handsets. It continues to augment its CDMA network facilities and to conduct marketing campaigns to encourage consumer adoption of new handsets. The penetration rate of location capable handsets is increasing, and Pioneer Cellular expects to be compliant no later than December 31, 2006.

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is good for
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emergencies.
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• INCREASED SAFETY

Pioneer Cellular is actively working with Public Safety Answering Points (PSAPs), otherwise known as E911 dispatch centers, to enable rescue personnel to find you even if you are unable to convey your location when you call. Upgrading to a CDMA phone and plan ensures that your location information will automatically be transmitted to emergency officials when you dial 911 in areas where this service is available.

• CONTINUED COVERAGE

Most carriers have switched to other technologies and are turning off Analog and TDMA channels.

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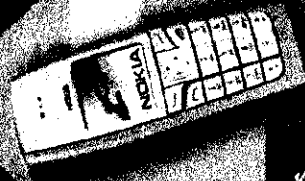
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Kim, medical assistant, mother
of two, wife of high school
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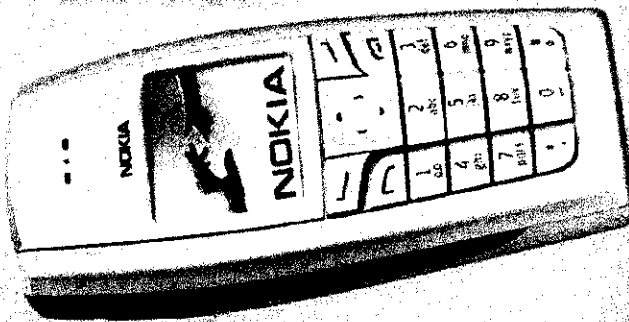
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FREE PHONE



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1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

IT'S TRUE:

MY FAMILY

IT'S ALWAYS ON
THE MOVE

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KEEPS US
TOGETHER**

Busy Family.
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AND FREE MONTH OF SERVICE!**